

EXHIBIT 4

Certificate of Service

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN

SOUTHERN DIVISION

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2013, I electronically filed the Debtor's Motion *in Limine* to Exclude the Testimony of Sharon McPhail with the Clerk of the Court which sends notice by operation of the Court's electronic filing service to all ECF participants registered to receive notice in this case.

Dated: December 16, 2013

/s/ Deborah Kovsky-Apap
Deborah Kovsky-Apap (68258)